

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

IN RE GENERAL MOTORS
COMPANY SHAREHOLDER
DERIVATIVE LITIGATION

This Document Relates To:

ALL ACTIONS

) Lead Case No.: 2:14-cv-11277-RHC-
) MKM
)
) Judge Robert H. Cleland
)
) Magistrate Judge Mona K. Majzoub
)
)
)
)

STIPULATION OF DISMISSAL AND ORDER

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the plaintiffs the Police Retirement System of St. Louis and Richard Hockstein (together, "Plaintiffs"), nominal defendant General Motors Company ("GM"), and defendants Mary T. Barra, Theodore M. Solso, Stephen J. Girsky, Patricia F. Russo, Thomas M. Schoewe, Erroll B. Davis, Jr., Kathryn V. Marinello, Rober D. Krebs, Cynthia A. Telles, James J. Mulva, Michael G. Mullen, David Bonderman, E. Neville Isdell, Carol M. Stephenson, Daniel F. Akerson, Edward E. Whitacre, Jr., Philip A. Laskawy, Daniel Ammann, Charles K. Stevens, III, Thomas S. Timko, Nicholas S. Cyprus, Michael P. Millikin, and Brian Thelen (with GM, "Defendants," and with Plaintiffs, the "Parties") have agreed to the dismissal of this matter with prejudice as to the named plaintiffs. The Parties stipulate to the dismissal with each party to bear its own costs, interests, or attorneys' fees. The Parties submit that notice of the voluntary dismissal to shareholders under Federal Rule of Civil Procedure

23.1(c) is not required here because (i) there has been no settlement or compromise of the action; (ii) there has been no collusion among the Parties; (iii) neither Plaintiffs nor their counsel has received or will receive directly or indirectly any consideration from Defendants for the dismissal; and (iv) the rights, if any, of other shareholders to pursue the same or similar claims on behalf of GM will not be prejudiced.

Stipulated and Agreed on May 4, 2018

ROBBINS ARROYO LLP

/s/ Ashley R. Rifkin

Brian J. Robbins
Kevin A. Seely (CA 199982)
Ashley R. Rifkin (CA 246602)
600 B Street, Suite 1900
San Diego, CA 92101
Telephone: (619) 525-3990
Facsimile: (619) 525-3991
arifkin@robbinsarroyo.com
brobbins@robbinsarroyo.com
kseely@robbinsarroyo.com

Lead Counsel for Plaintiffs

/s/ Raymond W. Henney

Raymond W. Henney (P35860)
HONIGMAN MILLER SCHWARTZ AND COHN
LLP
660 Woodward Avenue, Suite 2290
Detroit, MI 48226
(313) 465-7410
RHenney@honigman.com

Robert J. Kopecky (IL #3125334)
Joshua Z. Rabinovitz (IL #6272899)
KIRKLAND & ELLIS LLP
300 N. LaSalle Street
Chicago, Illinois 60654
(312) 862-2000
Robert.Kopecky@kirkland.com
Joshua.Rabinovitz@kirkland.com

Counsel for General Motors Company

/s/ Daniel J. LaCombe

Daniel J. LaCombe (P38602)
BARRIS, SOTT, DENN & DRIKER PLLC
211 W. Fort Street, 15th Floor
Detroit, Michigan 48226
(313) 965-9725
DLacombe@bsdd.com

Counsel for the Individual Defendants

ORDER

PUSUANT TO STIPULATION, IT IS SO ORDERED.

S/Robert H. Cleland
ROBERT H. CLELAND
UNITED STATES DISTRICT JUDGE

Dated: May 10, 2018

I hereby certify that a copy of the foregoing document was mailed to counsel of record and/or pro se parties on this date, May 10, 2018, by electronic and/or ordinary mail.

S/Lisa Wagner
Case Manager and Deputy Clerk
(810) 292-6522